

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

IN RE: Rick Kogan) Chapter 13
) Case No. 20 B 02173
Debtor(s)) Judge Deborah L. Thorne

Notice of Motion/Certificate of Service

Rick Kogan
160 N Stetson
Chicago, IL 60601

Debtor Attorney: Lakelaw
via Clerk's ECF noticing procedures

On July 27, 2022 at 9:00 am, I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <<https://www.zoomgov.com/>>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 160 9362 1728 and the password is no. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Friday, July 15, 2022.

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss for Material Default

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed pursuant to 11 U.S.C. §1307(c), and in support thereof respectfully states the following:

1. The Debtor filed for Chapter 13 relief on January 24, 2020.
2. The Debtor's plan was Confirmed on April 13, 2020.

3. The Debtor's confirmed plan requires the debtor to submit tax returns and refunds to the Trustee starting with tax year 2020.
4. The Debtor has failed to tender either the 2020 2021 tax return(s) or refund.
5. The failure to tender the tax return and refund constitutes a material default of the Debtor's confirmed plan.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this Court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE